Response to FCC GN Docket No. 25-133 (In Re: Delete, Delete, Delete)
Submitted by: KE9BDC / WRYR466
Date: March 13, 2025

Introduction
I am writing to express my strong support for ensuring the continued accessibility and protection of amateur radio for the public. Amateur radio plays a critical role in fostering community engagement, technological exploration, and, most importantly, emergency communications when disaster strikes. In times of crisis, when traditional communication networks fail, amateur radio operators provide a vital and often life-saving service that cannot be replaced by commercial or internet-based systems.

1. Amateur Radio's Role in Emergency Communications
Amateur radio operators have been instrumental in disaster response and recovery efforts for decades. Whether during hurricanes, earthquakes, wildfires, or other natural disasters, amateur radio provides an independent, decentralized, and rapidly deployable communication network that remains functional when conventional infrastructure is damaged or unavailable.

Key Benefits of Amateur Radio in Emergencies
- Reliable Communication When All Else Fails
- Flexibility and Rapid Deployment
- Public Safety and Coordination

Amateur radio has played a proven role in major disasters, including Hurricane Katrina, the California wildfires, and the Puerto Rico hurricanes, where operators provided the only available communications for days or even weeks.

2. Amateur Radio Supports Ongoing Disaster Preparedness
Beyond emergency response, amateur radio plays a key role in disaster preparedness efforts. Regular training exercises, emergency communication drills, and partnerships with FEMA, the Red Cross, and local governments ensure that amateur radio operators are always prepared to assist when disaster strikes.

3. The FCC Must Protect Affordable and Accessible Amateur Licensing
Given the critical role amateur radio plays in emergency communications, I strongly urge the FCC to
1. Eliminate all licensing fees to remove financial barriers to entry
2. Simplify the licensing process
3. Preserve and protect amateur spectrum allocations
4. Ensure regulatory support for emergency communication operations

By ensuring continued access to affordable licensing and protecting amateur spectrum, the FCC will be upholding public safety, strengthening disaster resilience, and supporting a longstanding community of operators dedicated to emergency response and technological advancement.

4. Deregulate Frequency Limits and License Classes
The current three-tier licensing system creates unnecessary complexity and restricts access to bands and modes. I propose
- Eliminating the Technician, General, and Extra license structure and granting all amateur operators full band and mode privileges
- Issuing a lifetime license with no renewal requirements
- Reducing the test to only cover essential FCC rules and operating procedures with an open-book format

5. Simplify the License Exam to Cover Only Essential Knowledge
The current amateur radio exam is overly complex and forces applicants to memorize unnecessary technical details that do not improve operating skill. Many new operators simply memorize the test questions and answers, rather than learning practical information that applies to real-world radio use. The exam should be revised to focus solely on rules, regulations, and responsible operating practices.

Proposal
- The test should be a **short, multiple-choice, open-book exam** that applicants can take online or in person.
- The exam should cover **only essential knowledge**, including:
  - Band allocations and where amateur operators can legally transmit
  - Identification requirements, including callsign usage and station identification
  - Power limits and interference prevention
  - Emergency communication protocols
  - Courtesy and best practices for on-air conduct
- Remove outdated and overly technical questions about electronics theory, circuit design, and propagation calculations, which are unnecessary for basic operation.
- Allow testing to be conducted online with automatic grading, eliminating the need for in-person testing sites.

These changes will **lower the barrier to entry**, making it easier for new operators to get licensed while ensuring that all licensees have the necessary knowledge to **operate legally and responsibly**.

6. Allow GMRS and Amateur Radio Use on the Same Device
Currently, Part 95 and Part 97 regulations prohibit radios from being programmed for both GMRS and amateur radio, despite the fact that modern radios are fully capable of both. This forces operators to buy multiple radios, creating unnecessary expenses.

Proposal
- Modify FCC rules to allow licensed GMRS and amateur radio operators to legally use the same radio
- Ensure that radios are properly programmed to meet the power, mode, and identification requirements of each service
- Prevent unlicensed operation while allowing greater flexibility for those with both licenses

This change eliminates unnecessary costs, increases efficiency, and promotes the use of properly configured, high-quality radios in both services.

7. Expand Technician Privileges to All Amateur Bands and Modes
The Technician license currently limits HF access, discouraging new operators from exploring long-distance communication. Since there is no technical reason to restrict HF access for licensed operators, all licensed hams should have full access to all bands and modes.

Proposal
- Grant all licensed amateurs full access to all amateur bands, including HF
- Remove outdated mode restrictions, allowing all operators to use voice, digital, and data modes freely

This reform encourages greater participation, reduces artificial barriers, and ensures that the amateur bands remain actively used instead of being targeted for reallocation.

8. Open the 10-Meter Band for FM Operation
Currently, FM operation on 10 meters is limited to a small portion of the band. Expanding FM privileges on 10 meters would encourage more activity, particularly as solar cycle conditions improve and make the band more accessible.

Proposal
- Allow FM operation across the entire 10-meter band, removing unnecessary restrictions
- Maintain band planning guidelines to prevent interference with CW, SSB, and digital modes
- Encourage Technician-class licensees to use the band for local and DX communication

This change enhances the usability of 10 meters, increases participation, and ensures that it remains actively used rather than being reallocated for commercial services.

9. Standardize Power Limits Across All Bands for All Operators
Currently, power limits vary across bands and license classes, creating confusion and artificial restrictions. There is no clear reason why a properly trained operator should be limited to lower power levels based on arbitrary distinctions.

Proposal
- Allow all licensed amateur operators to use up to 1500 watts PEP across all bands
- Remove license-class-based power limits and ensure all operators follow interference guidelines and best practices
- Continue to enforce good operating practices to ensure responsible power use

This reform simplifies power rules and ensures that all operators have equal privileges, reducing confusion and unnecessary regulatory complexity.

10. Remove Bandwidth Restrictions for Digital Modes and Allow Encryption
Current restrictions on digital bandwidth and encryption limit innovation in amateur digital communications. These restrictions should be removed to allow for more advanced digital experimentation and communications.

Proposal
- Remove all limits on digital mode bandwidth usage, allowing for higher data rate transmissions
- Permit encryption for all licensed amateur operators on all bands and modes for privacy, experimentation, and emergency use
- Maintain enforcement against unauthorized commercial use while allowing greater flexibility for amateur communications

This change promotes innovation, aligns amateur radio with modern cybersecurity practices, and ensures that the service remains relevant for future technological developments.

Conclusion
The current amateur radio regulatory framework is outdated, overly restrictive, and unnecessarily bureaucratic. The proposed changes would simplify licensing, increase accessibility, and promote innovation while ensuring that the amateur radio service remains open, active, and protected from commercial reallocation.

By implementing these reforms, the FCC can reduce regulatory burdens, encourage greater participation, and modernize amateur radio for the 21st century.

I strongly urge the Commission to deregulate licensing, testing, frequency access, power limits, digital bandwidth, and encryption rules to enhance and preserve the amateur radio service.

Thank you for your consideration.

KE9BDC / WRYR466
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